

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

RIXIE DILLARD

Plaintiff

v.

**HALLA CLIMATE SYSTEMS ALABAMA
CORPORATION, HALLA CLIMATE
CONTROL CORPORATION
& VISTEON CORPORATION**

Defendants.

Civil Action No.:

3:06-cv-00506-MEF-CSC

REPORT OF PARTIES' PLANNING MEETING

1. Meeting of the Parties

Pursuant to Federal Rule of Civil Procedure 26(f), a meeting was held on October 9, 2006, was attended by:

Dabney Ware, Esq., for Defendants, Halla Climate Systems Alabama Corporation, Halla Climate Control Corporation and Visteon Corporation (Defendants);

Roderick T. Cooks, Esq. for Plaintiff, Rixie Dillard ("Plaintiff").

2. Pre-Discovery Disclosures

The parties will exchange by November 7, 2006, the information required by Federal Rules of Civil Procedure 26(a)(1).

3. Discovery Plan

The parties jointly propose to the court the following discovery plan:

Discovery will be needed on the following subjects:

- Factual basis of Plaintiff's allegations and claims for damages;
- Factual basis of Defendants' defenses;

- Facts known to other persons believed to have discoverable information relevant to the claims and defenses of the parties; and
- Facts relating to affirmative defenses

All discovery, other than depositions of experts, is to be commenced in time to be completed by April 16, 2007.

Maximum of thirty-five (35) interrogatories including sub-parts by each party to any other party.

Responses due 30 days after service.

Maximum of thirty-five (35) requests for production by each party to any other party.

Responses due 30 days after service.

Maximum of thirty-five (35) requests for admission by each party to any other party.

Responses due by 30 days after service.

Maximum of seven (7) depositions by plaintiff and seven (7) by defendant.

Each deposition shall be limited to a maximum of seven (7) hours.

Reports from retained experts under Rule 26(a)(2) due:

from plaintiff by February 16, 2007

from defendant by March 16, 2007

Supplementations under Rule 26(e) are due within thirty (30) days of when a party learns that in some material respect the information disclosed is incomplete or incorrect and if the additional corrective information has not otherwise been made known to other parties in the discovery process or in writing.

4. Other Items

The parties do not request a conference with the court before entry of the scheduling order.

The parties request a pretrial conference in late September 2007.

A face-to-face settlement conference should take place by June 11, 2007.

The Parties are to file a Joint Notice Concerning Settlement Conference and Mediation by June 18, 2007.

Plaintiff should be allowed until November 20, 2006, to join additional parties and to amend the pleadings.

Defendants should be allowed until December 4, 2006 to join additional parties and to amend the pleadings.

All potentially dispositive motions should be filed by May 16, 2007.

The parties will evaluate settlement possibilities on a continuing basis.

Final lists of witnesses and exhibits under Rule 26(a)(3) should be due from all parties:

Thirty days before trial

Parties should have fourteen (14) days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3),

Identification of responsive parts to depositions should be due fourteen (14) days after service of final witnesses and exhibits lists,

Voir dire questions, motions in limine fully briefed, and any proposed jury instructions should be due by October 16, 2007.

The case should be ready for trial by the end of October 2007, and at this time is expected to take approximately three (3) days.

Respectfully submitted on this the 17th day of October, 2006.

/s/ Roderick T. Cooks

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